



## **LASSEN FOREST PRESERVATION GROUP**

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Randall J. Gould, District Ranger  
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875 Mitchell Avenue  
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Re: Comments on Proposed Challenge Community Protection and Fuels Reduction (CPFR) Project

Sent via email to: [comments-pacificsouthwest-plumas-featherrvr@fs.fed.us](mailto:comments-pacificsouthwest-plumas-featherrvr@fs.fed.us)

Lassen Forest Preservation Group would like to initiate scoping comments on the Challenge project located in Yuba and Butte Counties. Thank you for the opportunity to comment with this scoping notice. We understand it will be an Environmental Assessment (EA) and will be an authorized hazardous fuel reduction project under the Healthy Forest Restoration Act of 2003 as amended. We understand the project area is in a WUI, or "Wildland Urban Interface". We all understand the importance of protecting homes and communities from wildfire while also preserving the important ecosystems surrounding these communities.

In the scoping document, you note that the area encompasses the Pacific Southwest Research Station, Challenge Experimental Forest. The PSW is the research arm of the USFS. Will they have comments on the project? I contacted two people at the office of PSW in Redding and neither of them knew the project was planned. It seems they should have something to add regarding this project plan.

Please clearly show in the EA the cumulative effects of all the private and public land logging and other projects in and surrounding the project area. This region is obviously mixed ownership. Private lands surround the patches of public lands. Will the Forbestown and Brush Creek Projects have cumulative effects on the Challenge Project area? How will the Bugkill CE affect the ecology and wildlife of the Challenge area?

What kind of logging has been done on and in the area? Clearcuts? Salvage? Selection? DFPZ?

Where are the fires located? How was the land treated after the fires?

Has there been herbicide use in the area?

Please show all roads on your maps, private and public.

We would be opposed to any plan for new roads and we would like to see roads closed wherever possible. We know that roads are the highest source of sediment to our watersheds. They allow for illegal OHV and camping – potentially sources of wildfire.

Please show all trails and historical canals or springs.

We completely support any plan for prescribed fire and underburning and encourage the use of prescribed fire, as has been mandated by the region. Your scoping document says on page 3, “prescribed fire over much of the area is anticipated”. We want to see a definite, clear plan with a date for completion for underburning after this project.

We support all measures to use and potentially reopen local biomass plants to utilize the biomass that will be created by this project.

The biological assessment should include current surveys for California Spotted Owl (CSO), Northern Goshawk, Pacific Fisher and American marten. It is incredible that 5 CSO PACS are located within the project area. This is obviously high and CRITICAL habitat for these sensitive owls. Looking at Google photos, it is clear that Challenge is surrounded by private land that will not be habitat to the wildlife dependent on old forest characteristics.

We support the plan to include and analyze an alternative consistent with the “Draft Interim Recommendations for the Management of California Spotted Owl (CSO) Habitat on National Forest System Lands”, 5/29/15. We understand Region 5 directed all USFS supervisors in a 2/12/16 letter to consider these draft recommendations to be final. We think the Interim Recommendations should make up the proposed action, not an alternative.

These recommendations are very specific. Please show us the concentric circles for the CSO PAC, Territory and Home Range in your Biological assessment. Many scientific studies show that canopy cover does not need to be taken down to 30-40% to protect communities and trees greater than 20” can be kept to protect the wildlife habitat.

We will not accept the same proposed action you settled on for Forbestown. This area cannot continue to be heavily logged and still support species that could soon be listed as endangered. An expensive and unnecessary proposition for the USFS and the public.

There is clear, conclusive evidence of a range-wide decline for the California Spotted Owl (CSO). There is clear evidence that shows that decreasing canopy cover below 50-70% decreases colonization and reproduction and encourages abandonment of territories. There is clear scientific evidence that wildfire usually has no effect on territories. We realize this will be a challenge to protect this community while protecting the wildlife that many citizens move to the country to enjoy. We believe it can be done. This acreage can be thinned and underburned while protecting the habitat of the CSO. This cannot happen with your current proposed action.

We want to see the interim recommendations from the May 2015 paper by the USFS own scientists followed. We realize they may need to be tweaked or modified in the WUI, however many of the recommendations can be followed.

All measurements should be field based; this should be fairly simple on this small project area.

All measurements should be calculated using a densitometer.

Hand thin whenever possible.

No overstory trees removed. Save clumps. I think we have plenty of "gaps" in this area looking at Google.

There is no UDL in the IRs, but it is unnecessary to take trees greater than 20" UDL. Nowhere in the Challenge project area should the cc be taken down to less than 50% unless it is already in that condition.

**At the end of the IRs this background statement is so important, "An overarching point of concern that surfaced through the course of developing these interim recommendations was the existing forest-wide standards and guidelines that targeted 40-50% average canopy cover at the "unit" scale (i.e. stand scale), which at this small scale translates in the field to a minimum canopy cover. The outcome has been that stands with higher cc and variable cc conditions can be treated to reduce cc down to near 40% and simplify vertical structure by removing ladder fuels. These tx create more homogenous conditions within stands and across landscapes that meet the minimum criteria for suitable habitat, but provide low quality habitat for owls. These stands do not necessarily benefit the owl or other old forest associated species and can present barriers to managing for forest resilience." THESE ARE THE RECOMMENDATIONS OF THE USFS PREMIER OWL SCIENTISTS. WE ARE NOT CREATING RESILIENCE BY TAKING THE CC DOWN TO 40%. CAN'T WE LISTEN TO SCIENTISTS WHO HAVE BEEN EMPLOYED BY YOUR OWN LEADERSHIP?**

As stated before, there are many studies that show it is not necessary to take large trees, or take the cc down to 40% to "save the forest". All of these studies have been

referenced in the Sierra Forest Legacy comments on this project. In fact several studies show a correlation between lower canopy covers and more severe fires. They also show that higher canopy cover forests are more resilient to fire. We need a combination of higher canopy clumps and contiguous areas along with the gaps that will be created around houses and possibly along the roads.

The science suggesting that larger trees and clumps need to be thinned to increase resilience to drought and bark beetles has also been debunked. Debunked again by the most important scientists in the USFS – Malcolm North, Collins and others.

The project area is in the Feather River Drainage. This is one of the most impaired watersheds in the state of California. How will the project protect this sensitive watershed?

The project also seems to surround the community of Woodleaf. There is an outdoor school there. Our public lands are used by the school to educate students on wildlife, ecology, habitat, trees, birds and all the other wonderful things the forest holds. This is education sorely missing in our schools and children LOVE the opportunity to attend. How will this beloved school and surrounding area be protected so it will continue to provide inspiration and teaching for the students?

I see one of the “specific purposes of the project is to: “UTILIZE REMOVED MATERIAL – TIMBER AND SMALLER TREES – TO CREATE AN ECONOMIC BENEFIT LOCALLY AND GENERATE PARTIAL FUNDING FOR OTHER SERVICE FUEL REDUCTION TREATMENTS.” We are all probably aware, unless you take trees greater than 20”, there will be little economic benefit from this project to the USFS and the public, who fund the USFS. However, there will be an economic benefit to the community with jobs generated.

When you compare the economic COST of wildfire to this community to the small cost it would take to thin the area EVEN at a LOSS to the USFS. (if you didn’t take any big trees) The benefit will clearly be a positive for the USFS and the public who own this land.

When you compare the COST that listing the California Spotted Owl will be to the USFS to the COST of doing a project that will protect and maintain the habitat for these birds within the community; the decision is clear.

Again, we ask you make the proposed action a progressive project that will both protect this community from wildfire (as best we can being human) AND maintain the habitat that 5 California Owl Families depend on!

Thank you for considering our comments and please keep us updated on this project. Sincerely,

Patricia Puterbaugh  
Lassen Forest Preservation Group

